

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

20-875000126

EPA-OTS



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Mr. Kyd D. Brenner  
 Director of Public Affairs  
 Corn Refiners Association  
 1001 Connecticut Avenue, NW  
 Washington, DC 20036

RE: IC-1789

Dear Mr. Brenner:

This letter is a follow-up response to the meeting held on September 26, 1986 between representatives from two member companies of the Corn Refiners Association (Frances Katz of American-Maize Products Co.; Fred Schultz and Dr. Mort Rutenberg of National Starch and Chemical Corp.) and members of the Chemical Inventory Section staff at EPA.

The purpose of the meeting was to discuss whether waxy corn products should be classified on the TSCA Inventory as reaction products of starch or amylopectin.

The Agency has determined that corn products should be classified according to the source. When the source of starch used in a reaction product is waxy corn, waxy sorghum, waxy barley, or waxy rice, whose granules consist of approximately 100% amylopectin, the Agency names the product as an amylopectin (CASRN 9037-22-3) derivative. This CASRN (9037-22-3) also includes the amylopectin produced by fractionation of starch granules. Similarly, if by plant breeding and hybridization in the future, you produce a corn source which is approximately 100% amylose (CASRN: 9005-82-7) its reaction products should be named as amylose derivatives. This CASRN (9005-82-7) also includes the amylose produced by fractionation of the starch granules.

When the source of starch consists mainly of a mixture of amylose and amylopectin in various proportions such as in regular corn, wheat, sorghum, potatoes, tapioca, etc. the Agency names the products as starch (CASRN: 9005-25-8) derivatives. This would apply to starches from any source as long as they are made up primarily of amylopectin and amylose.

In order to have the correct entries on the TSCA Inventory, the Agency is willing to accept corrections to the original Inventory forms when these are indicated.

## CONCURRENCES

SYMBOL	TS-790	TS-790						
SURNAME	MATTA	Farris						
DATE	12/9/86	12/10/86						



If a manufacturer was producing an amylopectin product and reported it as a starch product, corrections could be sent for such product (45 FR 50544, July 29, 1980). These corrections should include documentation as evidence that the amylopectin product was manufactured at the time, i.e., that waxy corn, waxy barley, etc. was used in the manufacture of these products instead of starch. This documentation could be laboratory orders for material, orders for feedstock, etc. and should be relatively easy to provide. If both the amylopectin and the starch product were produced at the time, a new Form C (in addition to the original Form C) would have to be submitted for the amylopectin product.

The Agency is exploring some ways by which the Inventory listing of PMNs made from amylopectin and listed as starch can be changed. You will receive a follow-up letter addressing this topic as soon as possible.

In the future, you may wish to get permission from Mrs. Mary Cushmac, Prenotice Coordinator at (202) 382-3745 in order to send consolidated PMNs that would include both the amylopectin and starch products.

If there are any further questions concerning this matter, please contact Dr. Lygia B. Matta of my staff, or write, referring to this letter as IC-1789 and address to:

OTS Document Processing Center  
U.S. Environmental Protection Agency  
Office of Toxic Substances (TS-790)  
401 M Street, SW  
Washington, DC 20460  
ATTN: Chemical Inventory Section

Sincerely yours,

Carol A. Farris  
Chief  
Chemical Inventory Section